

NSD/CES/REGISTRATION UNIT

DEPARTMENT OF THE TREASURY WASHINGTON, D.C. 20220 2011 DEC 23 AM

License No. SU-3410

Sudanese Sanctions Regulations

LICENSE

(Granted under the authority of 50 U.S.C. §§ 1601-51, 1701-06, Executive Orders 13067 and 13412, and 31 C.F.R. Parts 501 and 538.)

To: Law Office of Bart S. Fisher 700 12th Street, NW, Suite 700 Washington, DC 20005 Attn.: Bart S. Fisher, Esq.

- 1. Based on your letters dated May 25, 2010, and October 14, 2010, to the Office of Foreign Assets Control (the "Application"), and information otherwise available to the Office of Foreign Assets Control, the transactions and activities delineated herein are hereby authorized.
- 2. This License is granted upon the statements and representations made in the Application, or otherwise filed with or made to the Treasury Department as a supplement to the Application, and is subject to the condition, among others, that the Licensee(s) will comply in all respects with all regulations, rulings, orders and instructions issued by the Secretary of the Treasury under the authority of the International Emergency Economic Powers Act (50 U.S.C. 1701 et seq.), the National Emergencies Act (50 U.S.C. 1601 et seq.), and the terms of this License.
- 3. The Licensec(s) shall furnish and make available for inspection any relevant information, records or reports requested by the Secretary of the Treasury, or any other duly authorized officer or agency.
- 4. This License expires on November 30, 2012, is not transferable, is subject to the provisions of Executive Orders 13067 and 13412, and any regulations and rulings issued pursuant thereto, including 31 C.F.R. Parts 501 and 538, and may be revoked or modified at any time in the discretion of the Secretary of the Treasury. If this License was issued as a result of willful misrepresentation on the part of the applicant or his duly authorized agent, it may, in the discretion of the Secretary of the Treasury, be declared void from the date of its issuance or from any other date.
- 5. This License does not excuse compliance with any law or regulation administered by the Office of Foreign Assets Control or another agency (including reporting requirements) applicable to the transaction(s) herein licensed, nor does it release Licensee(s) or third parties from civil or criminal liability for violation of any law or regulation.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

Andrea Gacki

Assistant Director for Licensing

Nov. 16,2010

Date

Attention is directed to 18 U.S.C. § 1001, 50 U.S.C. § 1705, and 31 C.F.R. § 538.701 for provisions relating to penalties.

License No. SU-3410 Page 2 of 2

SECTION I - AUTHORIZATION: (a) Subject to the conditions and limitations set forth herein, the Law Office of Bart S. Fisher (the "Licensee"), is hereby authorized to receive (i) payment for those legal services to be provided to the Government of Sudan (the "Client") that are authorized by section 538.505 of the Sudanese Sanctions Regulations, 31 C.F.R. Part 538 ("SSR"), and (ii) reimbursement of expenses to be incurred in connection with these legal services.

- (b) Any transfers of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this License to avoid the blocking or rejection of the transfer.
- SECTION II CONDITIONS: Payments to the Licensee for professional fees and expenses authorized by this License must not originate from a source within the United States, or from any source outside the United States within the possession or control of a U.S. person other than the Client, or from any entity or individual whose property or interests in property are blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R., other than the Client.
- SECTION III WARNING: (a) Except as expressly authorized by the terms of this License, or otherwise by the Office of Foreign Assets Control, this License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F.R.
- (b) Except as expressly authorized by the terms of this License, or otherwise by the Office of Foreign Assets Control, nothing in this License authorizes the receipt of funds or other property, directly, or indirectly, from any entity or individual whose property or interests in property are blocked pursuant to any Executive order or Chapter V of Title 31 of the C.F..
- (c) Nothing in this License authorizes the provision of services not authorized by § 538.505(b) of the SSR, including public relations and lobbying services, or the receipt of payment of fees or reimbursement of expenses other than for the purposes delineated in Section I above.
- SECTION IV RECORDKEEPING AND REPORTING REQUIREMENTS: (a) The Licensee is subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken pursuant to this License for a period of five years from the date of each transaction.
- (b) See 31 C.F.R. § 501.605 for additional requirements regarding reports to OFAC, courts, and other adjudicators on litigation, arbitrations, and dispute resolution proceedings.

SECTION V - PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the facts and circumstances specific to the Application.

Law Office of Bart S. Fisher Registration No. 6076

Telephone conversation with Bart Fisher, registration number 6076, Law Offices of Bart S. Fisher. In response to a letter sent from our office regarding the following deficiencies.

- 1. Articles of Incorporation Mr. Fisher said that he is not incorporated and does not have any documentation of ownership for the sole practice.
- 2. Unsigned short form Mr. Fisher will provide a signed copy of the short form
- 3. Requested Mr. Fisher to provide a copy of the OFAC license to the office. Received an email from Mr. Fisher with a copy of the OFAC license on 12/23/2011.
- 4. Mr. Fisher sent a letter to Rep. Wolf but did not consider it informational materials. Mr. Fisher told me that he wasn't trying to lobby Rep. Wolf with the letter and that he did not do it at the direction of the Sudan government. However, Mr. Fisher wrote the letter to Rep. Wolf in response to personal comments Rep. Wolf made of Mr. Fisher at Congress.

Mudd, Alex (NSD)

From:

metroctr_staff [metroctr_staff@metroffice.com]

Sent:

Friday, December 23, 2011 9:22 AM

To:

Mudd, Alex (NSD)

Cc: Subject: bart_fisher2002@yahoo.com From: Law Office of Bart S. Fisher

Attachments:

Registration No. 6076.pdf

Dear Mr. Mudd:

Thank you for providing clarification of the issues in the letter I received from Ms. Heather H. Hunt.

As per your request, I have attached a copy of the license granted by the Office Foreign Assets Control (OFAC) to the Law Office of Bart S. Fisher authorizing the provision of legal services for the Government of Sudan (License No. SU-3410). Should you need additional information please do not hesitate to contact me.

Bart Fisher

Tel: 202 659 2979 (office)

202 746 7089 (cell)